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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 922(g)(1))

RHONDU BROWN,

Case No. 22-MJ-1105

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

EDWARD MARTIN, being duly sworn, deposes and states that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) duly appointed according to law and acting as such.

On or about October 13, 2022, within the Eastern District of New York and elsewhere, the defendant RHONDU BROWN, knowing that he had been previously convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm, to wit: a Ruger LC380 .380 caliber pistol with serial number 32484343, and ammunition.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; and from reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. On or about October 13, 2022, at approximately 6:00 a.m., ATF agents arrived at the defendant RHONDU BROWN’s residence at 428 Columbia Street, Apartment 2C, in Brooklyn, New York to execute a search warrant signed on October 12, 2022 by the Honorable Robert M. Levy, United States Magistrate Judge for the Eastern District of New York (See 22-MJ-1091).

3. As law enforcement agents knocked on RHONDU BROWN’s door and announced themselves, other agents outside the building observed BROWN throw a clear plastic bag and a jacket out the back window of his apartment, which is located on the second floor of the building. The bag landed on a scaffolding structure beside the building, and agents observed several plastic vials of what appeared to be crack cocaine on the scaffolding in and immediately around the bag. The jacket landed on the ground, and agents observed a partially exposed firearm protruding from one of its pockets. The firearm was determined to be a Ruger LC380 .380 caliber pistol with serial number 32484343. It was loaded with five rounds of ammunition in the magazine and an additional round in the chamber.

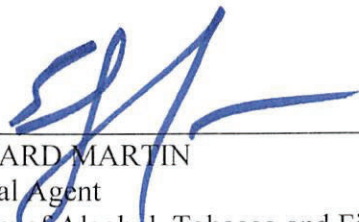
4. The defendant RHONDU BROWN was arrested and was read his Miranda rights. He agreed to waive those rights and to be interviewed by ATF agents. BROWN stated,

in substance and in part, that the plastic vials belonged to him and contained crack cocaine, and that the firearm also belonged to him.

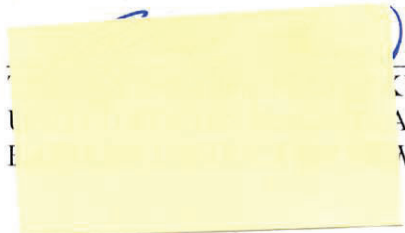
5. I have reviewed the defendant's criminal history, which revealed, among other felony convictions, that on or about December 13, 2012, RHONDU BROWN was convicted of three offenses stemming from three separate arrests: Robbery in the Second Degree, Gang Assault in the First Degree and Robbery in the Third Degree in Kings County Supreme Court. For these three convictions, BROWN was sentenced to five years' imprisonment on January 9, 2013.

6. I have conferred with an interstate nexus expert at ATF, who has informed me, in substance and in part, that the firearm recovered was manufactured outside the state of New York.

WHEREFORE, your deponent respectfully requests that the defendant RHONDU BROWN be dealt with according to law.

  
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EDWARD MARTIN  
Special Agent  
Bureau of Alcohol, Tobacco and Firearms

Sworn to before me this  
13th day of October, 2022



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NOTARY PUBLIC  
STATE JUDGE  
NEW YORK